

IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT COURT OF MARYLAND

DAVID TIMBERS

*

Plaintiff,

*

v.

*

Civ. Action No.: JKB-21-00293

TELLIGENT MASONRY, LLC, *et al.*

*

Defendants.

*

* * * * *

**DEFENDANT TIA TAYLOR’S OPPOSITION TO PLAINTIFF’S MOTION FOR
LEAVE TO FILE AN AMENDED COMPLAINT**

Defendant, Tia Taylor (“Taylor”), through counsel and pursuant to Rule 15 and Rule 16 of the Federal Rules of Civil Procedure submits this Response in Opposition to Plaintiff’s Motion for Leave to File an Amended Complaint. In support thereof, Taylor refers the Court to the attached Memorandum of Points and Authorities, which is fully incorporated and adopted herein, and states as follows:

1. David Timbers (“Plaintiff”) has requested leave to file a Second Amended Complaint. (*See* ECF No. 41).
2. Taylor opposes Plaintiff’s request as it fails to comply with the Federal Rules of Civil Procedure.
3. In particular, the Motion fails to establish good cause as required by Rule 16(b).
4. Consequently, Taylor requests that the Court deny the Motion and enter further relief as justice requires.

Respectfully submitted,

/s/Imoh E. Akpan

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of August, 2022, a copy of the foregoing Opposition to Plaintiff's Motion for Leave was served via the ECF system to: James M. Ray, II, Esq., Ray Legal Group, LLC, 8720 Georgia Avenue, Suite 904 Silver Spring, MD 20910, *Counsel for Plaintiff David Timbers*; Brandon N. Mourges, Esq., Crepeau Mourges, 1344 Ashton Road, Suite 110, Hanover, MD 21076, *Counsel for Defendant Telligent Masonry, LLC*.

/s/Imoh E. Akpan

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